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October 22, 2018

Honorable Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
Via Electronic Filing

Re: ANAS OSAMA IBRAHIM ABDIN V. CBS et al.  
Civil Case No. 1:18-CV-07543 NRB

Honorable Judge Buchwald:

Pursuant to the Local Rules 7.1(d) and/or 5.2(b) and your Honor's rules, plaintiff hereby requests a pre-motion conference or alternatively leave to amend pursuant to F.R. C. P. Rule 15. Plaintiff consented to the defendant's request for an extension of time to respond to the first amended complaint in this action. Said time terminates on November 6, 2018. To date, the defendants have not filed an answer, responsive motion, corporate disclosure statement, nor officially appeared in this matter.

Notwithstanding the above facts, the attorneys for the parties have discussed the plaintiff filing a second amended complaint based on defendant's consent. Our discussion has gone on ad nauseum since mid-September. We have supplied the defendant with a substantive copy of the proposed amended complaint. Our changes were highlighted. Plaintiff demonstrated to the defendant that plaintiff added wholly owned and controlled corporate subsidiaries of the defendant CBS, one additional cause of action, and additional substantive facts regarding plaintiff's lawsuit. Additionally, defendants' attention was drawn to public domain facts added as exhibits.

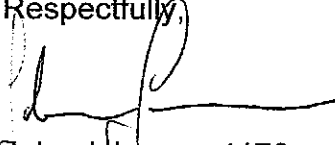
Plaintiff has not been dilatory, nor have the defendants been prejudiced based upon the fact that they have yet to appear in this action. Notwithstanding the above facts, plaintiff has not been able to get a confirmation of consent to the amendment.

Rather than waste judicial resources, by having the defendant's file a motion to dismiss or one for summary judgment, then having the plaintiff respond with a request for

leave to amend, we seek to make a motion for leave or seek leave now. Again, no one has officially appeared in this action. No prejudice can be said to have befallen the defendants. Defendant's have been apprised and given notice of our changes. Plaintiff agrees to provide the defendants with an additional 14 days to appear or otherwise respond.

Notwithstanding, the early stage of the litigation, defendants have not consented to an amendment, despite being fully apprised of the substantive changes to the complaint. therefore, plaintiff seeks a pre-motion conference which may help to resolve this matter once and for all, or alternatively leave to amend. Again, it is our firm belief that allowing the plaintiff to move/amend now saves all involved the time and expense of unnecessary motion practice and allows this matter to be decided on its merits. A copy of the amendment is attached hereto.

Respectfully,



John Johnson 4170  
Co-Counsel for plaintiff

CCD: ji  
Via ECF  
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Loeb & Loeb  
Attorneys for the Defendants

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